February 9, 1998

Mr. Andrew C. Welch
High Desert Power Project, LLC
3501 Jamboree Road, South Tower Suite 606
Newport Beach, CA 92660

Dear Mr. Welch:

HIGH DESERT POWER PROJECT DATA REQUESTS No.s 95 THROUGH 107

Pursuant to Title 20, California Code of Regulations, section 1716, the California Energy Commission (Energy Commission) staff requests that the High Desert Power Project, Limited Liability Company supply the information specified in the enclosed data requests (Data Requests 95 through 107).

The subject areas addressed in these data requests are alternatives and cultural resources. Written responses to the enclosed data requests are due to the Energy Commission staff by March 9, 1998 or at such later date as may be agreed upon by the Energy Commission staff and the applicant. If you are unable to provide the information requested in the data requests or object to providing it, you must, within 15 days of receiving these requests, send a written notice of your inability or objection(s) to both Commissioner Jananne Sharpless, Presiding Member of the Committee for this proceeding, and me. The notification must also contain the reasons for not providing the information and the grounds for any objections (see Title 20, California Code of Regulations section 1716 (e)).

If you have any questions regarding the enclosed data requests, please call me at (916) 653-1614, or Eileen Allen at (916) 654-4082.

Sincerely,

Richard Buell
Siting Project Manager

Enclosure

cc: Proof of Service, 97-AFC-1
Norman Caouette, Mojave Water Agency
Charlie Kraus, Victor Valley Water District
Cherilyn Widell, State Office of Historic Preservation

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DATAREQ3.WPD

HIGH DESERT POWER PROJECT
DATA REQUESTS
(97-AFC-1)

Technical Area: Alternatives
Lead Authors: Matt Layton and Steve Baker

ISSUE: The data response to Data Request #24 included estimates of capital costs, incremental performance, and water use of wet, wet/dry, and dry cooling tower configurations. The incremental performance degradation from use of either wet/dry or dry cooling technologies should only affect the steam cycle of the combined cycle and not the gas turbines performance. However, based on the performance data provided it is not clear whether this degradation was applied only to the steam cycle, or to the entire combined cycle. This information will be used to quantify the costs of dry or wet/dry cooling towers, which will be used in turn to determine whether or not staff should recommend that dry or wet/dry cooling technologies be required to mitigate any significant water supply impacts which staff may identify in its analysis. We do not disagree with the conclusion that alternative cooling technologies are more costly than wet cooling towers. However, to provide a complete comparison, we need to quantify, with numeric values, the benefits and disbenefits of the various cooling technologies. These benefits and disbenefits touch on other areas besides water use, such as noise, air quality, generation efficiency, land use, visual, and public safety and nuisance.

95. Please state if the "incremental performance and water use table" provided in response to Data Request #24 applies only to the steam cycle, or applies to the entire combined cycle.

96. Please identify the assumptions and calculations underlying the values presented in the "incremental performance and water use table" provide in response to Data Response #24 for each of the combined cycle configurations (frame F or G turbines) and for each of the three cooling technology alternatives.

97. Please provide the assumptions and calculations underpinning the capital costs shown in Data Response #24, including but not limited to, discussions of whether labor and financing costs are included in the estimates, and whether the performance levels for the cooling technologies are specified.

98. Please provide the assumptions and calculations underlying the values in the Data Response #24 Table 24-1, "HDPP Cooling Technology Comparison".

99. Please provide energy balances for each of the combined cycle configurations at 50, 75, 100 percent and peak loads, assuming 59 and 98 °F ambient temperatures.

100. The last sentence of Data Request #24 states that "[t]hese values are extreme for water and other methods for conserving water would be more prudent." Please describe these "more prudent" methods for conserving and managing water. Please include costs estimates, expected environmental consequences, assumptions and calculations.

ISSUE: The data response to Data Request #25, Alternatives, included relative comparison of estimates of the environmental benefits and disbenefits of wet, wet/dry, and dry cooling tower configurations. However, the data response, especially the information shown in the table, did not provide quantification to allow an understanding of the magnitude of benefits and disbenefits.

101. Please provide quantities of water used and discharged, and water preparation and clean-up chemicals used for the various configurations identified in the response to Data Request #25.

102. Please quantify air emissions from the project stacks and cooling towers, for each of the combined cycle configurations and cooling technology alternatives: 1) assuming fuel use is increased to compensate for efficiency and capacity losses, and 2) assuming fuel use is not increased but kept constant and efficiency and capacity losses are realized.

103. Please quantify the structural dimensions and land requirements of each of the cooling technology alternatives in each of the combined cycle configurations.

104. Visible plumes from the cooling towers may interfere with aviation safety or represent a significant visual impact. Please quantify expected occurrences and sizes of visible plumes for each of the cooling technology alternatives.

105. Please quantify noise levels from each of the cooling technology alternatives.

HIGH DESERT POWER PROJECT
DATA REQUESTS
(97-AFC-1)

Technical Area: Cultural Resources
Author: Kathryn Matthews

ISSUE: The reviewer at the State Office of Historic Preservation (SHPO) has notified the Energy Commission that he needs a map showing the location of the parcels to supplement the names identified in the parcel ownership list provided in AFC Table 1.0-1. The location and type of federal ownership and/or involvement in the project will shape how SHPO will participate in the Commission's regulatory review process. This comment and request were provided in a letter dated July 30, 1997, from Cherilyn Widell, SHP Officer, to Bob Therkelsen.

In staff's January 8, 1998 conference call with Amy Steck and Andy Welch, we were told that all of the various federal parcels identified in Table 1.0-1 were military and that they were in the process of conversion from federal ownership to ownership or control by the (SCIA) Southern California International Airport and/or by the (VVEDA) Victor Valley Economic Development Authority. We were assured that once the base parcels changed ownership, there would be no more federal involvement and, presumably, SHPO's interests would become moot.

In recent discussions with county and city officials, we have been informed that the military cannot relinquish control or involvement in a former base until and unless the site has been fully cleaned up and no potential for toxic or hazardous materials remains. Therefore the information on federal ownership is still relevant.

106. Please provide a current parcel map of the area affected by the project, showing the location and parcel identification numbers for those federal parcels owned or managed by the individuals and/or agencies listed in AFC Table 1.0-1.

107. Please provide a list of current addresses for the federal entity(ies) identified in Table 1.0-1 of the AFC.